

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL MORGAN and LIBERTY
RISK CONSULTING, LLC, and
INFLUENCED EDGE, LLC,
Plaintiffs,

Civil Action

No. 2:22-cv-1631

Magistrate Judge Lenihan

v.

AMY NOSS, KEITH HICKEY,
JOYCE MORGAN, BRITTANY
PADUGANAN, and ETBP
ENTERPRISES, LLC d/b/a
THRIVE TALENT
MANAGEMENT,
Defendants.

CERTIFICATE OF CONFERRAL RE MOTION TO DISMISS

I hereby certify that I have made good faith efforts to confer with Plaintiffs' counsel to determine whether the identified pleading deficiencies properly could be cured by amendment. Specifically, I first notified Defendants' counsel of the potential of moving to dismiss related to personal jurisdiction and/or failure to state a claim via email on December 21, 2022, the same day that I entered my appearance. We briefly discussed this issue via video conference on December 22, 2022. We then discussed our respective positions regarding the legal sufficiency of various claims in detail via telephone on January 6, 2023.

Thereafter, on February 3, 2023, Plaintiffs filed an Amended Complaint with Defendants' consent. On February 10, 2023, I notified Plaintiffs' counsel via email that while the Amended Complaint cured some deficiencies that I had previously raised, I still did not believe that it cured the issues raised in the accompanying Motion to Dismiss. Counsel for the parties exchanged emails between February 10 and February 14, resulting in Plaintiffs' counsel stating that they would not amend the Complaint unless required or permitted by the Court.

Date: February 15, 2023

/s/ Christine T. Elzer